

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
:
ZEN JV, LLC, *et al.*,¹ : Case No. 25-11195 (JKS)
:
Debtors. : (Jointly Administered)
:
: **Objection Deadline:**
: **October 3, 2025 at 4:00 p.m. (ET)**
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**COVER SHEET FOR SECOND MONTHLY APPLICATION
OF LATHAM & WATKINS LLP FOR COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS BANKRUPTCY
COUNSEL FOR THE PERIOD FROM AUGUST 1, 2025 THROUGH AUGUST 31, 2025**

Name of applicant: Latham & Watkins LLP
Authorized to provide professional services to: Debtors and Debtors-in-Possession
Date of retention: August 11, 2025, effective as of June 24, 2025
Period for which compensation
and reimbursement are sought: August 1, 2025 through August 31, 2025
Amount of compensation sought as actual,
reasonable, and necessary: \$223,380.50 (80% = \$178,704.40)
Amount of expense reimbursement sought
as actual, reasonable, and necessary: \$10,592.60

This is a(n): X monthly ___ interim ___ final application

This monthly application includes 9.4 hours with a value of \$12,020.50 incurred in connection with the preparation of fee applications.

Prior Applications Filed:

Docket No.	Date Filed	Period Covered	Fees	Expenses	CNO Filed
313	08/25/2025	6/24/2025 – 7/31/2025	\$3,073,816.75	\$5,934.33	Objection Deadline 9/15/2025

¹ The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

COMPENSATION BY PROFESSIONAL

Name of Professional	Position; Date of Hire; Year of Obtaining License to Practice	Hourly Billing Rate²	Total Hours Billed	Total Compensation
Arthur, Candace M.	Partner. Joined firm in 2024. Member of New York Bar since 2010. Member of Restructuring Department.	\$2,095.00	54.0	\$113,130.00
Chandrasekhar, Sandhya	Counsel. Joined firm in 1998. Member of Illinois Bar since 1990. Member of Tax Department.	\$2,070.00	2.3	\$4,761.00
Kaplan, Binyomin	Counsel. Joined firm in 2022. Member of New York Bar since 2001. Member of Corporate Department	\$1,980.00	8.5	\$16,830.00
Waller, Laura Marie D.	Counsel. Joined firm in 2020. Member of Illinois Bar since 2004. Member of Tax Department.	\$1,875.00	3.2	\$6,000.00
Lim, Christopher W.	Associate. Joined firm in 2017. England and Wales (Solicitor), 2019. Member of California Bar since 2021. Member of Corporate Department.	\$1,635.00	15.7	\$25,669.50
Gordon, Jonathan	Associate. Joined firm in 2020. Member of Illinois Bar since 2018. Member of Restructuring Department.	\$1,635.00	27.2	\$44,472.00
Clevenger, Blake	Associate. Joined firm in 2023. Member of New York Bar since 2024. Member of Corporate Department.	\$1,145.00	2.9	\$3,320.50
Han, Alice	Associate. Joined firm in 2024. Member of California Bar since 2024.	\$975.00	6.7	\$6,532.50
Tarrant, Christopher M.	Senior Paralegal. Joined firm in 2022.	\$650.00	4.1	\$2,665.00

Grand Total
Total Hours
Blended Rate³

\$223,380.50
124.60
\$1,792.78

² All non-working travel time has been billed at 50% of the normal hourly rate.

³ The blended rate is calculated based on the hourly rates for all professionals and paraprofessionals.

COMPENSATION BY PROJECT CATEGORY

Project Category⁴	Total Hours	Total Fees
Asset Disposition/Asset Sales	35.80	\$55,553.50
Case Administration (Docket, WIP and Calendar Updates)	0.60	\$981.00
Claims Administration and Objections	2.40	\$4,384.00
Corporate Governance and Board Matters	7.50	\$13,688.50
Creditors Committee Matters	5.90	\$11,578.50
Employee Matters (including Benefits/Pensions)	9.20	\$18,029.50
General Case Strategy (WIP Calls, Team and Client Calls)	3.10	\$5,068.50
Insurance	0.20	\$327.00
International / Foreign Matters	0.30	\$490.50
Leases and Contracts	1.10	\$1,798.50
Meetings and Communications with Creditors	0.30	\$490.50
Plan and Disclosure Statement/Confirmation/Implementation/Plan Supplement	48.80	\$98,970.00
Retention/Fee Matters (L&W)	9.40	\$12,020.50
Grand Total	124.60	\$223,380.50

⁴ All non-working travel time has been billed at 50% of the normal hourly rate.

EXPENSE SUMMARY

Expense Category	Total Expenses
Ground Transportation - Local	\$1,177.16
Meal Services	\$3,177.38
Meals - Local	\$985.31
Trainfare	\$412.00
Transcripts	\$4,840.75
Total	\$10,592.60

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ZEN JV, LLC, <i>et al.</i> , ¹	:	Case No. 25-11195 (JKS)
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Debtors.	:	(Jointly Administered)
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	:	Objection Deadline:
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**SECOND MONTHLY APPLICATION OF LATHAM & WATKINS LLP
FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED AS BANKRUPTCY
COUNSEL FOR THE PERIOD FROM AUGUST 1, 2025 THROUGH AUGUST 31, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and the *Order Pursuant to 11 U.S.C. §§ 331, 330, AND 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 258] (the “**Interim Compensation Order**”), Latham & Watkins LLP (“**L&W**”) hereby files this application (the “**Application**”) seeking a monthly allowance with respect to the sum of \$223,380.50 (80% of which equals \$178,704.40) as compensation and \$10,592.60 as reimbursement of actual and necessary expenses, for a total of \$233,973.10 for the period from

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

August 1, 2025 through and including August 31, 2025 (the “**Compensation Period**”). In support of this Application, L&W respectfully represents as follows:

Background

1. On June 24, 2025 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. No trustee or examiner has been appointed in these Chapter 11 Cases. On July 2, 2025, the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (the “**Creditors’ Committee**”) [Docket No. 65].

3. The Debtors’ chapter 11 cases are being jointly administered pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

4. Additional information regarding the Debtors’ business and capital structure and the circumstances leading to the commencement of these chapter 11 cases is set forth in the *Declaration of Michael Suhajda, Chief Financial Officer, in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 36], filed on June 26, 2026, which is fully incorporated herein by reference.²

5. L&W was retained effective as of the Petition Date by this Court’s Order, dated August 11, 2025 [Docket No. 297] (the “**Retention Order**”). The Retention Order authorized L&W to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

Compensation Paid and Its Source

6. All services for which L&W is requesting compensation were performed for or on behalf of the Debtors.

7. L&W has received no payment and no promises for payment from any source for services rendered or to be rendered in connection with the matters covered by this Application.

8. Pursuant to Bankruptcy Rule 2016(b), L&W has not shared, nor has L&W agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel, and associates of L&W, or (b) any compensation another party or person has received or may receive.

Fee Statement

9. The fee statement for the Compensation Period is attached hereto as Exhibit A. This statement contains daily time logs describing the time spent by each professional and paraprofessional for this period. To the best of L&W's knowledge, this Application complies with Sections 330 and 331 of the Bankruptcy Code, Local Rule 2016-2, all other applicable Bankruptcy Rules, the Guidelines adopted by the Office of the United States Trustee, and the Interim Compensation Order.

Actual and Necessary Expenses

10. A summary of actual and necessary expenses and daily logs of expenses incurred by L&W during the Compensation Period is attached hereto as Exhibit B. Pursuant to Local Rule 2016-2, L&W represents that it will charge for copying at a rate of \$0.10 per page. There is no charge for incoming or outgoing telecopier transmissions.

11. L&W believes the foregoing rates are the market rates that law firms charge clients for such expenses. In addition, L&W believes that such charges are in accordance with the

American Bar Association's ("**ABA**") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

Summary of Services by Project

12. The actual, reasonable, and necessary services rendered by L&W during the Compensation Period can be grouped into the categories set forth below. These categories are generally described below, with a more detailed description of the services provided set forth on the attached Exhibit A. The professionals and paraprofessionals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in Exhibit A attached hereto.

A. Asset Disposition/Asset Sales

Fees: \$55,553.50

Total Hours: 35.80

13. This category includes time spent in connection with post-closing matters related to the Debtors' three sales of substantially all their assets, which sales closed on July 31, 2025 [*see* Docket Nos. 266, 267, & 269]. Specifically, L&W attorneys spent time analyzing and negotiating issues related to trademarks, contract assignments, IP assignments, and document retention, among other things.

B. Case Administration (Docket, WIP and Calendar Updates)

Fees: \$981.00

Total Hours: 0.60

14. This category includes time spent in connection with, among other things, coordinating the administration of these Chapter 11 Cases by revising a comprehensive work-in-progress report for the Debtors and the Debtor advisor teams.

C. Claims Administration and Objections

Fees: \$4,384.00

Total Hours: 2.40

15. This category includes time spent in connection with analyzing potential claims and corresponding with other advisors in connection with such claim analysis.

D. Corporate Governance and Board Matters

Fees: \$13,688.50

Total Hours: 7.50

16. This category includes time spent in connection with governance matters. Specifically, L&W attorneys provided services relating to advising on director duties, communicating with the Debtors on privileged matters, and preparing for, attending, and presenting at board and special committee meetings in furtherance of administering the Chapter 11 Cases.

E. Creditors' Committee Matters

Fees: \$11,578.50

Total Hours: 5.90

17. This category includes time spent in connection with negotiations and discussions with the Creditors' Committee advisors, including participating in meetings to discuss the terms of a chapter 11 plan, the Creditors' Committee's request for document production and matters related to their investigation of matters related to the Challenge Period and investigation of potential estate claims and causes of action.

F. Employee Matters (including Benefits/Pensions)

Fees: \$18,029.50

Total Hours: 9.20

18. This category includes time spent on matters relating to the Debtors' employees, including analyzing and providing advice regarding termination, benefits and severance.

G. General Case Strategy (WIP Calls, Team and Client Calls)

Fees: \$5,068.50

Total Hours: 3.10

19. This category includes time spent preparing for and attending scheduled work-in-progress meetings among L&W professionals and the Debtors' other advisors to analyze and address ongoing issues and workstreams in these Chapter 11 Cases.

H. Insurance

Fees: \$327.00

Total Hours: 0.20

20. This category includes time spent relating to the Debtors' insurance policies or coverage, including correspondence with counsel to the Debtors' insurance carrier regarding the Debtors' insurance premiums.

I. International / Foreign Matters

Fees: \$490.50

Total Hours: 0.30

21. This category includes time spent relating to the impact and interdependencies related to the winddown of the Debtors' non-U.S. affiliates and the Debtors' relationship therewith.

J. Leases and Contracts

Fees: \$1,798.50

Total Hours: 1.10

22. This category includes time spent in connection with the analysis of executory contracts and unexpired leases, including cure costs associated with the potential assumption of executory contracts.

K. Meetings and Communications with Creditors

Fees: \$490.50

Total Hours: 0.30

23. This category includes time spent engaging with certain creditors and addressing their inquiries related to, among other things, the various developments occurring in these Chapter 11 Cases and related matters.

L. Plan and Disclosure Statement / Confirmation / Implementation / Plan Supplement

Fees: \$98,970.00

Total Hours: 48.80

24. This category includes time spent in connection with the Debtors' chapter 11 plan, including (a) developing and negotiating a framework for a chapter 11 plan and a global settlement among the Debtors' key constituents, including their secured lenders and the Creditors' Committee, (b) negotiating with various stakeholders in connection with plan treatment, and (c) reviewing and revising the Debtors' chapter 11 plan and related materials.

M. Retention/Fee Matters (L&W)

Fees: \$12,020.50

Total Hours: 9.40

25. This category includes time spent reviewing and revising L&W's invoice and fee statement for the period from the Petition Date through July 31, 2025 for privilege, confidentiality, and compliance with the U.S. Trustee's fee guidelines.

Valuation of Services

26. Attorneys and paraprofessionals of L&W have expended a total of 124.60 hours in connection with this matter during the Compensation Period. The nature of the work performed by these persons is fully set forth in Exhibit A attached hereto. The hourly rates set forth in Exhibit A are L&W's normal hourly rates for work of this character. The reasonable value of the services rendered by L&W to the Debtors during the Compensation Period is \$223,380.50.

27. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by L&W is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services in other cases under this title. Moreover, L&W has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Local Rule.

WHEREFORE, L&W respectfully requests that the Court authorize that, for the Compensation Period, an allowance be made to L&W pursuant to the terms of the Interim Compensation Order with respect to the sum of \$223,380.50 as compensation for necessary professional services rendered (80% of which equals \$178,704.40), and the sum of \$10,592.60 as reimbursement of actual necessary costs and expenses, for a total of \$233,973.10, and that the sum of \$189,297.00 (80% of fees and 100% of expenses) be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: September 12, 2025
Wilmington, Delaware

Respectfully Submitted,

/s/ Candace M. Arthur

LATHAM & WATKINS LLP

Ray C. Schrock (admitted *pro hac vice*)

Candace M. Arthur (admitted *pro hac vice*)

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- and -

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Counsel for the Debtors and Debtors in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
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ZEN JV, LLC, <i>et al.</i> , ¹	:	Case No. 25-11195 (JKS)
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Debtors.	:	(Jointly Administered)
	:	
-----	X	

DECLARATION OF CANDACE M. ARTHUR

1. I am a partner with the applicant firm, Latham & Watkins LLP (the “**Firm**”), and have been admitted to the bar of the State of New York since 2010. I make this certification in accordance with Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”).

2. I am familiar with the work performed on behalf of the Debtors² by the Firm’s professionals. I have reviewed the *Second Monthly Application of Latham & Watkins LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtors for the Period from August 1, 2025 Through August 31, 2025* (the “**Application**”), and the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

3. Moreover, I have reviewed Local Rule 2016-2 and, to the best of my knowledge, information, and belief formed upon the basis of my participation in these cases, as well as after

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application (as defined herein).

reasonable inquiry, the facts set forth in the Application materially comply with the provisions of the Local Rules, the Bankruptcy Code, and this Court's orders.

Date: September 12, 2025
New York, New York

/s/ Candace M. Arthur
Candace M. Arthur